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Robert T. Opal
General Counsel and URA Vice President

August 29, 2008

Via E-Filing

The Honorable Anne Quinlan
Acting Secretary
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20024

**Re: Finance Docket No. 35175, Roseburg Forest Products, et.al., --
Alternative Rail Service -- Central Oregon & Pacific Railroad**

Dear Secretary Quinlan:

The August 25, 2008 petition in this proceeding requests that the Board issue an Alternative Rail Service Order which, among other things, would authorize the West Texas and Lubbock Railway Company (WTL) to temporarily replace Central Oregon & Pacific Railroad (CORP) as the operator on the line segment between Black Butte and Belleview, OR. This line segment is owned by UP and leased to CORP.

UP takes no position as to whether alternative service should be authorized. However, WTL currently has no agreement with UP covering WTL's use of the Black Butte-Belleview line segment. Accordingly, in the event the Board authorizes WTL to provide alternative rail service over this segment, the authorization should be contingent on WTL entering into an agreement with UP covering its use of this segment. We do not anticipate any problem working with WTL, as we have generally satisfactory relations with Permian Basin roads, but an agreement is necessary to protect UP's interests.

Very truly yours,

A handwritten signature in black ink, appearing to read "R. T. Opal", written over a horizontal line.

Robert T. Opal

cc: Persons listed on Certificate of Service

CERTIFICATE OF SERVICE

I certify that, on August 29, 2008, I served the foregoing document on the persons listed below:

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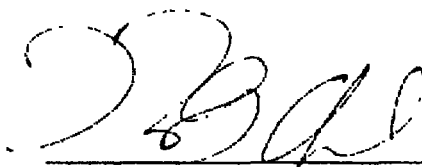
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